DOCUMENT RESUME

ED 415 037 RC 021 204

TITLE	Title IX: Indian Education Formula Grant. Parent Committee Roles & Responsibilities.
INSTITUTION	Alaska Comprehensive Regional Assistance Center, Juneau.
PUB DATE	1997-00-00
NOTE	21p.
PUB TYPE	Guides - Non-Classroom (055) -- Reports - Descriptive (141)
EDRS PRICE	MF01/PC01 Plus Postage.
DESCRIPTORS	Alaska Natives; *American Indian Education; American Indians; Educational Legislation; Elementary Secondary Education; Federal Aid; *Grants; *Parent Participation; Responsibility; *School Community Relationship; *School Districts
IDENTIFIERS	Indian Education Act 1972; *Parent Committees

ABSTRACT

The purpose of the Title IX parent committee, as mandated by the Indian Education Act of 1972, is to work with local school districts in the development and implementation of Title IX formula grant projects that meet "the special educational and culturally related academic needs" of Native American students. This document outlines the role and responsibilities of the parent committee (PC). At least 51% of PC members must be parents; one member must be a teacher; and one member must be an American Indian or Alaska Native secondary school student. PC functions include establishing committee by-laws; assisting the local education agency (LEA) in grant development and proposals, including needs assessment, goals and objectives, and activities; participating in project evaluation and monitoring; working closely with the LEA; and acting as liaison between the LEA and the community. Each of these PC functions is described in detail. LEA and PC responsibilities are listed, and a chart outlines month-by-month duties of Title IX project staff and PC members. (SAS)

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Alaska Comprehensive Regional Assistance Center

Title IX: Indian Education Formula Grant

Parent Committee
Roles & Responsibilities

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210 Ferry Way, Suite 200
Juneau, Alaska 99801
VOICE: (907) 586-6806; FAX: (907) 463-3811
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Title IX Parent Committee Role & Responsibilities
The Facts

Summary: The general purpose of the Title IX Parent Committee is to work with school districts in the development and implementations of the Title IX Formula Grant projects which are designed to "meet the special educational and culturally-related academic needs" of Native American students." Local parent involvement is authorized by P.L. 92-318, the Indian Education Act, 1972 (IEA as amended).

◊ Committee Structure & Composition - At least 51% of members must be parents; one member must be a teacher; and one member must be AI/AN secondary student.

◊ Parent committee (PC) members play a **consultative** role in:

- PC governance
- Project development & grant application
- Project operation & evaluation
- Interaction with the district
- Interaction with the local community

◊ If Title IX funds are used in a schoolwide program, the schoolwide program must be consistent with the purpose of Title IX section 9111 and must be approved in writing by the Parent Committee.

- **Section 9111**
  - programs are based on challenging State content standards and State student performance standards that are used for all students; and
  - are designed to assist [Native] students [in] meeting those standards and assist the Nation in reaching the National Goals.

For additional information and workshops:
Contact: Teresa Sappier, Native Education Coordinator

SERRC-AKRAC, Anchorage Site Office
(907) 349-0651
tsappier@hotmail.com
or
teresas@akrac.k12.ak.us

PARENT COMMITTEE (PC)
Title IX Indian Education Projects

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PARENT COMMITTEE

ROLES AND RESPONSIBILITIES
IN TITLE IX - FORMULA GRANT PROJECTS

The general purpose of the Title IX Parent Committee is to work with school districts in the development and implementation of Title IX - Formula Grant projects, which are designed "to meet the special educational and culturally-related academic needs" of Native American students. The involvement of local parent committee organizations in these federal grant programs is mandated by authority of P. L. 92-318, the Indian Education Act, 1972 (IEA), as amended). Federal Indian Education Application regulations (34 CFR Sections 250 and 251) outline specific responsibilities and functions of the parent committee as these to the Title IX project and its administration by the local school district, referred to as the "local education agency" (LEA).

In order for any group or committee to operate effectively, members must be able to work together as an organizational unit. Therefore, it is important that members of the committee be familiar with the responsibilities and functions relative to the development and implementation of Title IX educational programs.

A. Parent Committee: Structure and Composition

Any organization is composed of individual members. However, the type of organization will determine the nature of the membership. For Title IX Parent Committees, federal regulations (34 CFR 251.20) identify who is eligible to serve and to participate as a committee member.

1. At least half (51%) of the members must be parents;
2. At least one (1) member must be a teacher;
3. At least (1) member must be an American Indian or Alaskan Native secondary (high school) student, if any such student is enrolled within the school district.

The regulations further specify that the members of the parent committee are to be selected by those persons who are eligible to serve as Title IX parent committee members. Such an election process can be the responsibility of the LEA, the parent committee, or both. Regardless of the method(s) used, the selection process should be delineated with provisions contained in a governing document referred to as "Parent Committee By-laws."

The opportunity for parental involvement in education programs serving American Indian and Alaska Native students in one of the major features of P.L. 100-297 the Indian Education Act, 1988. Provisions of this legislature mandate the formation of local parent committees for the purpose of consultation with LEAs (local school districts) in the development and implementation of Title IX - Formula Grant projects. In general, the consultation role of Title IX parent committee is required for the following:

1. Parent committee governance
2. Project development and grant application
3. Project operation and evaluation
4. Interaction with the school district
5. Interaction with the local community

B. Specific Parent Committee Functions

1. Parent Committee Governance

The level or degree of parent committee involvement in Title IX - Formula Grant projects is determined primarily through two (2) sources, federal IEA regulations establish the general framework for parent committee participation in project development, grant application review and approval, and project operation and evaluation. These regulations are derived from legislative provisions contained within P.L. 100-297.

Parent committee by-laws serve as the second source for identifying the roles and responsibilities of the parent committee with respect to the Title IX project. With the submission of a Title IX Grant Application, an LEA provides an assurance to comply with the following federal regulations:

"(vi) The parent committee selected in accordance with s.251.20 will adopt and abide by reasonable by-laws for the conduct of the project..."

Committee by-laws should establish and delineate provisions for the governance of parent committee activities, as well as for addressing prerequisite consultation responsibilities to the

LEA. Ideally, these by-laws should be developed in cooperation with the LEA so as to clarify...

- the relationship between the Title IX Parent Committee and the LEA
- the extent of Parent Committee involvement in project development, the review and approval of the grant application, and project operation and evaluation;
- the administration and governance of Parent Committee activities (e.g., membership selection, election of officers, conducting meetings and public hearings, etc.)

2. Project Development and Grant Application

Federal IEA regulations (34 CFR s.251.22) specify that there will be participation by the local community and parent committee in the development of Title IX - Formula Grant projects and related proposals. Before the preparation (or prior to the submission) of a formula grant application, a public hearing is required to solicit local community and parental input for the proposed project. The major purposes of the hearing are to assess educational needs or concerns that might be addressed by the project; and to facilitate communications (e.g., recommendations, suggestions, requests or proposed consideration) between the LEA and local community. Disseminating announcements and conducting the public hearing are primarily the responsibilities of the LEA. However, the parent committee can share the coordination activities for the hearing in cooperation with the LEA.

When submitting a federal grant application, the LEA provides certain prerequisite assurances concerning the involvement of the local community and parent committee in the development, review, and approval of the proposed education project. These assurances specify that:

"(v) The applicant has developed the project...

(A) In open consultation with parents of Indian students - including persons acting in loco parentis other than school administrators or officials - teachers, and, where applicable, secondary school students...

(B) With the participation of a parent committee selected in accordance with s.251.20; and

(C) With written approval of that parent committee."

For the requirements of the federal grant application, there must be some form of documentation providing evidence of local community involvement (i.e., public hearing) in the development of the proposed Title IX project. In addition, documentation must accompany the application that provides evidence of the review process and written approval of the grant application by the parent committee. Such documentation can be provided in various forms such as:

- Copy of the Title IX public hearing announcement;
- Transcript of the proceedings and/or minutes of the public hearing;
- Transcripts of the official minutes for the Title IX parent committee meeting where formal action was taken to approve the proposed project and related grant application;
- Written statement (with authorized signatures) specifying that there was a formal review process, and that formal approval action was taken by the Title IX parent committee at a duly-convened meeting.

Establish Parents Committee Role in Needs Assessment: The parent committee should discuss with the LEA the specific activities that it will perform in the needs assessment process. These should be a part of a set of policies and procedures which can be negotiated with the LEA and which may be part of the parent committee by-laws.

Initiate Early Involvement in needs Assessment Design: The parent committee should make certain it is notified well in advance of the application development/deadline sot hat its input about student needs may be solicited.

- Parent committee members should be involved as much as possible in the design of any needs assessment survey such as a questionnaire of interview schedule. If there is a feeling on the part of the parent committee members that a particular survey or survey item is inappropriate, this should be communicated to the project staff and the LEA for proper consideration.
- The parent committee should review the needs assessment survey to ensure that it is comprehensive in covering all main issues; that the directions, cover letter and all items are easily understandable to other parents; an that it is presented in a

non-threatening manner to parents, students, teachers, and other community members.

- The parent committee should suggest to the project staff and the LEA the most convenient time for administering the survey. Income tax time, holidays, traditional feasts, or other periods of tribal importance may hinder the implementation of the survey.
- If a mail-out survey is used, the parent committee should suggest what they consider a reasonable amount of response time for setting deadlines.

Solicit Parental Interest and Involvement: The parent committee should informally encourage other parents and members of the community to actively participate in the surveys so that they may understand the nature and purpose of a needs assessment. Remember, it is the responsibility of the LEA to actually conduct the needs assessment; however, the parent committee must be consulted.

Obtain Other Student Data: The parent committee should request various types of information from the LEA, including: student achievement levels; results of tests; drop-out rates; attendance records; and other data that may assist in identifying the needs of American Indian and Alaska Native students. The parent committee should ensure that such information be kept on file by the project. Remember that the confidentiality of such information must be protected.

When looking at student data, the sources of the data should be considered. Often the sources of the data (e.g., parents, teachers, students, etc.) are just as important as the types of data (grade reports, standardized test scores). Community and other tribal leaders should be consulted if appropriate.

Rank the Needs by Priority: The parent committee should actively participate in ranking the needs by priority. Remember that because a need is ranked as a top priority, it does not necessarily mean that it must be addressed by the Title IX project. Among the distinctions to make in assessing and ranking the needs by priority are:

- Whether the need is to produce an increased level of performance (an incremental need) or to maintain a level of performance.
- Whether the need is short-term of long-term.

- Whether the need is severe or slight.
- Whether the need can be addressed adequately.
- Whether the need is temporary or permanent.
- Whether the need is exhibited by a large number of students or by a few individuals.

Consider Other Programs: The parent committee should request information about programs offered by a school so that they are aware of the purposes and intents of other programs. This information is useful in deciding whether a particular need, including the first priority need, is addressed by some other program. If existing program services are inadequate for American Indian and Alaska Native students, ask why the case and what may be done to remedy it.

Recommend Activities and Alternatives: After ranking needs by priority, the parent committee should suggest to the project staff and LEA any activities or program components that they feel would appropriately and effectively meet those needs. The parent committee may periodically suggest alternative methods of assessing needs. The parent committee should offer other approaches to meeting a need if the committee does not see the need effectively or efficiently met.

Parent Committee Involvement in Application Development and Review:

- Awareness of Application Deadline: The parent committee should know the application deadline date and the necessary steps for submitting the application.

  - The parent committee should ensure that the application process is started well before the deadline. It is certainly not necessary to have the application packet before beginning this process. Indeed, this process should be well underway before the application packet is received for IEP.

  - The parent committee should be aware that application packets are distributed at least 45 day before the deadline date. The parent committee should check or not to see whether or not application packet has actually been received by the school.

- Developing Goals and Objectives: The parent committee should participate in developing the overall goals and specific objectives of the project, keeping in mind that these goals and objectives should be based on the priority needs identified during the needs assessment.

  - Parent committee members should know the difference between goals and objectives. General goal statements indicate the general direction or intent of the project. Objectives must be written as specific statements of the results expected and must be measurable.

  - At a minimum, the parent committee should review goal statements and objectives prepared by the project staff to ensure that they address the priority needs of the American Indian and Alaska Native students. Parent committee members should volunteer advice and/or assistance to the project staff in developing specific objectives.

- Recommending Approaches and Activities: Once the goals and objectives have been determined, the parent committee should review and discuss ways in which the goals and objectives could be achieved.

  - Consideration should be given to ...
    - ⇒ whether or not the method is appropriate to the community or the school
    - ⇒ whether other methods could be used to achieve the objectives
    - ⇒ the cost of alternative methods
    - ⇒ the effectiveness of alternative methods

  - If a Title IX program already exists, the parent committee should review the project's effectiveness to date and also use the above considerations to recommend whether the existing project components should be continued, modified, or dropped, and other components added.
  - Based upon discussion, the parent committee should be able to recommend and justify their choice of components they feel should be included in the project. These recommendations should be used to guide the project staff in preparing the written project application.

- Public Hearing: The parent committee should review the draft application and make recommendations on the proposed project as part of the public hearing. When the LEA schedules the public hearing, the parent committee should have some input to ensure that...
  - ⇒ the hearing is scheduled at well in advance of the application deadline to allow time for making any changes to the proposed project;
  - ⇒ the hearing is a time which is convenient for community attendance and which does not conflict with important events or holidays;
  - ⇒ the hearing is well publicized.

- Parent committee members should attend and actively participate in the public hearings and should encourage other community members to so so. Parent committee and other community members should ask questions to make sure that they understand the project.

- Those persons attending the hearing should review the proposed project application to make sure that:

  - ⇒ the proposed project addresses needs identified during the needs assessment
  - ⇒ the objectives are written as specific, measurable statements of results expected
  - ⇒ the proposed activities are related to the stated objectives and are clearly outlined
  - ⇒ an evaluation plan is included
  - ⇒ the proposed expenditures are reasonable and necessary for achieving the project objectives
  - ⇒ the project staffing plan abides by the Indian Preference requirements of the Indian Education Regulations.

- Final Review and Approval: The parent committee must review and approve, in writing, the final project application before it will be considered for funding by the Office of Indian Education (OIE). During this final review, the parent committee should again address the topics listed earlier for consideration at the public hearing. The parent

committee should also ensure that the final application reflects the community input received at the public hearing.

C. ***Specific Parent Committee Roles in Evaluation***

At a minimum, a consultation role by the Title IX - Parent Committee is required in the operations and evaluation of the Title IX - Formula Grant project. To receive Title IX project funding, an LEA must establish and provide documentation of "policies and procedures, including those relating to the hiring of personnel; and will ensure that the project will be operated and evaluated in consultation with the involvement of parents of the children; and representatives of the area served, including the parent committee."

The scope of parent committee involvement in the operation and evaluation of a Title IX project is determined, in part, by the provisions of the parent committee by-laws. The delegation of any responsibilities by the LEA to the committee, above the prerequisite consultation roles, will also influence the degree of parent committee involvement in project operations. Consequently, the development of committee by-laws and the relationship between the LEA and parent committee are critical factors in determining the level of committee participation in project management and evaluation. There are other influencing factors to be considered, including:

- ⇒ the general relationship between the Title IX parent committee and the local school board
- ⇒ the management system, (that is, policies and procedures), of the local school district
- ⇒ the administrative philosophies of LEA officers
- ⇒ the leadership capabilities of parent committee officers
- ⇒ the commitment of parent committee members to fulfill Title IX project responsibilities
- ⇒ the availability of resources, including training for the parent committee to carry out project responsibilities

- Evaluation Plan: The parent committee should play a major role in developing the overall project evaluation plan. Moreover, the parent committee should offer specific recommendations regarding its own ongoing evaluation responsibilities. At the onset of each project cycle, there should be a clear understanding between the LEA and the parent committee as to whom the

committee should work with regarding evaluation, namely, the LEA, and evaluator, the project director or coordinator, or an internal person assigned evaluation responsibilities. The parent committee should also be fully aware of the Title IX evaluation role and responsibilities of the LEA and project staff, in order to better understand where the committee's functions fit into the evaluation effort as a whole.

- Project Monitoring: On a regular basis during the project year, the parent committee should assist the LEA in determining whether the project is being carried out according to the stated intent of the law. Consider the following questions:

  ⇒ Is the project meeting the stated objectives? Are any revisions needed?
  ⇒ Is the project adhering to the time frames set down in the grant applications?
  ⇒ Are those time frames still appropriate?
  ⇒ Is the project operating within the budgetary parameters approved by the Office of Indian Education (OIE)?
  ⇒ Are project staff performing their tasks satisfactorily?
  ⇒ Is the project well-managed?

Project monitoring ca be greatly facilitated by holding regular meetings with the project staff. Also, all LEA and project files should be open to the public for review (except, of course, those of a confidential nature relating to individual students). The parent committee should make use of these files only as appropriate.

Personnel: The parent committee should be involved to some degree with the assessment of staff performance. Remember, however, that the project staff is an official employee of the LEA. Parent committee should assume no responsibility which would interfere with or jeopardize this employer/employee relationship.

The extent to which a parent committee exercises responsibilities in evaluating staff performance will vary from project to project. Usually, the extent of staff performance evaluation should be addressed in the parent committee by-laws. Thus,

there is no rule of thumb as to the amount of parent committee involvement in evaluating staff performance.

Since personnel matters can be a sensitive area, whatever the degree of involvement the parent committee and LEA agree to, it is important that there be written confirmation of the committee's authority and/or responsibility.

The agreement may be specified:

⇒ in the committee by-laws
⇒ as an amendment to the school district's Personnel Policies and Procedures
⇒ as a written agreement between the LEA and Parent Committee, in conjunction with the guidelines pertaining to parent committee involvement in hiring such as screening applicants for project staff positions.

D. ***Interaction with the School District (LEA)***

Although not a formal part of the local school system, the Title IX parent committee is required to work very closely with the school district. Committee members should therefore have access and obtain information about the local school system so that they will better understand the operation of the LEA.

To develop an understanding LEA operations, the parent committee should first determine what types of information are available and relevant to the responsibilities of the parent committee. Possible areas which the committee should obtain information about include:

- School budget and fiscal resources
- Institutional policies and procedures (e.g., personnel)
- Student support services and special projects
- Curriculum and academic standards (district and state standards)
- Curriculum and instructional resources
- Physical plant facilities and office space allocation

For any identified area, the committee should determine what specific information is available (e.g. policy statement, policy/procedure manuals, annual and special reports, evaluation, etc.), where information is located, and who should be contacted for acquisition or retrieval of desired information. Committee members should be aware of any applicable procedures and regulations concerning public access to desired information.

Having fundamental information about the LEA and its basic operation should enable parent committee members to understand how the Title IX project fits into the school system. However, committee members also need to understand how they, as representatives of the American Indian and Alaska Native community, will interact with the LEA in carrying out their committee responsibilities. Thus, it important that the committee establish specific procedures relating to its participation in the needs assessment, the development and review of the project application, and the evaluation of the project.

These procedures should become part of the committee's written records and should be on file with the LEA. In addition, the parent committee members should become request that the LEA provide documented procedures that the LEA will follow in carrying out its responsibilities toward the project. Such written procedures will ensure that both the parent committee and the LEA are aware of the specific actions that each of them will follow during the development and implementation of the Title IX project.

If parent committee members have difficulty understanding information provided by the LEA or determined what procedures to follow, the committee should request assistance from the LEA. In addition, the committee may wish to request training in topics such as:

- ⇒ proposal writing skills,
- ⇒ needs assessment,
- ⇒ program evaluation,
- ⇒ program management,
- ⇒ or federal regulation analysis.

Upon occasion, the Office of Indian Education (OIE) offers technical assistance on program management, program design and accountability. The project coordinator will be kept abreast of any OIE updates regarding any of these training opportunities. Parent committee members should attend these training as should the Title IX coordinator and other school district administrators and teachers.

As an organization unit representing the local Indian community. the parent committee may become involved with various efforts to influence LEA decisions on school policies or issues that affect Indian students enrolled within the school district. Such efforts may require attending school board meetings or special meeting with LEA officials. In participating in these types of activities, individual committee members must keep in mind that they are representing the interests of the parent committee and/or the local Indian community. This representation does nor necessarily preclude the communication of personal opinions; however, committee members should also keep in mind whose viewpoint is being presented.

- 506 Forms: The parent committee should be aware of the lEA's method of collecting 506 forms and regularly monitor the process. When appropriate, suggesting for modifying or improving those procedures should be offered. The LEA should be informed of any potentially eligible students whose 506 form is not on file.
- Student Count Date: Each student should have on file at the school district's Title IX program a 506 Form.

5. *Interaction With The Local Community*

In carrying out Tile IX project responsibilities, parent committee members serve as representatives of the local Indian community. As such, they are responsible for ensuring that there is adequate input from the community with respect to project activities. This means that there must be regular communication between committee members and community constituents. The communication process should occur during all phases of the project.

The parents committee serves vital role of linking the school district (including project staff) with the Indian community. In providing this link, it is responsible for ensuring that an effective two-way channel of communication exists between school and parents, Further, it should monitor the LEA's procedures for keeping parents informed about project activities and, more importantly, about project progress. Making recommendations for improving the effectiveness of those procedures is clearly a parent committee function. Conversely, as the official parental body representing the community which elected it, the parent committee should consistently and actively seek community input on all aspects of the project

operation. It is essential that such input be an integral part of the ongoing evaluation process.

Because the involvement of the parent committee is statutorial for Title IX Formula Grant project, the parent committee has the responsibilities to make certain decisions regarding the funded program the serve. It is essential that the members of the community, and especially the leaders of the group, develop the ability to run meetings in an orderly manner which will ensure that varying points of view can be heard, and that the community's business will be completed according to the schedule. The following general outline provides a common format for conducting meetings. Figure 5, 6, and 7 provides summaries of lEA and PC responsibilities toward the operation of a Title IX-Formula Grant project.

Summary

Throughout this chapter are listed procedural suggestions on "How to" establish a Tile IX parent committee's involvement in the Title IX Formula Grant project. The scope and extent of parent committee involvement in the Title IX Formula Grant project is, of course, determined by the prerequisite consultation role. However, it must be remembered that the delegation of any responsibilities by the lEA to the parent committee will also ultimately responsible for the project, the relationship between the LEA and parent committee is critical in determining the level of committee participating in project management and evaluation.

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Figure 5. Responsibilities of the Local Educational Agency

1. Ensure that a parent committee is selected in accordance with CFR Part 251.20.
2. Consult with and involve the parent committee in all phases of the project.
3. Perform a needs assessment to help determine what the focus of the Title IX Program should be.
4. Describe the project in detail as required in CFR Part 251.22 (b)(1).
5. Conduct a public hearing as required by CFR Part 251.22.
6. Obtain the parent committee's written approval of the grant proposal via letter, statement, or minutes of the meeting documenting their approval. All subsequent amendments and revisions to the proposal must also include PC approval.
7. Provide the PC with applicable regulations, the grant award document, and correspondence to or from the Department of Education relating to the Title IX proposal.
8. Prepare the PC to carry out its responsibilities by arranging appropriated training sessions for them.
9. Ensure that the best available talents and resources, from the Native American community whenever possible, are used to achieve project goals.
10. Develop policies and procedures relating to the employment of project staff in consultation with the PC (251.22)(B)(5).
11. Monitor and evaluate the project in accordance with an evaluation plan that meets the requirements of EDGAR (75.590).
12. As certain that a student certification form is on file for each Indian student included in the participant count. program funding is based on the amount of Indian students in the school with 506 forms on file.
13. Require progress and financial reports periodically to keep informed about the grant administration.
14. Ensure that the annual progress and financial reports are submitted to the U.S. Department of Education on the required forms in a time manner.
15. Maintain fiscal control and fund accounting procedures as may be necessary to satisfy and audit investigation.
16. Assure that the grant funds are not used to carry out any activities that would ordinarily be paid for by the LEA. Title IX grant funds are for supplemental purposes and should not supplant LEA funds.

Figure 6. Responsibilities of the Parent Committee

1. Adopt by-laws to include, at a minimum, procedures on:

    a. the selection and duties of officers;
    b. filling vacated terms on the committee;
    c. conducting the business meetings;
    d. amending the by-laws;

2. Participate in the needs assessment, design, operation, and evaluation of the project.

3. Review and approve the grant proposal prior to submission for application. Approval may be indicated via letter, signed statement, or minutes of meeting deciding approval.

4. Advise LEA on the development of policies and procedures relating to the hiring of. project staff.

5. Review the qualification of potential staff and make recommendations to LEA regarding. applicants for positions.

6. Keep community informed of program by advertising meetings, making available copies of the by-laws, meeting minutes, list of committee members, and other pertinent information related to the program which is not protected by law from disclosure.

7.. Attend and participate in monthly PC meetings.

Figure 7. Relationship Between Parent Committee Involvement and the Administration of Title IX Projects

Month	Project Director.Staff	Parent Committee
August	• Hire for vacant positions	• Follow procedures for involvement in hiring project staff
September	• Begin count of eligible students • Identify students for services, assess, pre-test, etc.	• Parent Committee election of members and officers
October	• Meet with selected evaluator • Hold public hearing • Prepare preliminary student count • Review Needs Assessment results set priorities	• Make recommendations on selection of evaluator • Review Needs Assessment results, set priorities
November	• Design project and management plan	• Participate in developing project and management plan
December	• Design ***"measurable"*** objectives, begin writing project application • Design the formative (on-going) evaluation plan with the evaluator	• Participate in designing project measurable objectives • Participate in the formative evaluation
January	• Mid-year evaluation/assessment of project	• Monitoring report from staff
February	• Make certain records, data and all documentation current.	• Review project activities
March	• Complete, submit application	• Review, approve application for submission to OIE
April	• Conduct budget reviews and/or submit modifications	• Visit project and provide program feedback
May	• Review project evaluation draft and final report • Respond to OIE application review form (checklist), if received • Plan needs assessment	• Participate in review of draft and final evaluation report • Monitor project response to OIE letter • Participate in planning needs assessment
June	• Receive Grant Award Notice (GAN) and final grant amount (revise budget) • Prepare and submit Grant Performance Report to OIE • Implement needs assessment	• Review, approve revised budget • Review, approve Grant Performance Report before submission to OIE

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